



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

March 23, 2025

BY ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Streets
New York, New York 10007

Re: *United States v. Charlie Javice and Olivier Amar*, 23 Cr. 251 (AKH)

Dear Judge Hellerstein:

The Government respectfully writes in furtherance of the admission of Government Exhibit 1762, an August 1, 2021 calendar invitation for a 12:30 video meeting sent by defendant Charlie Javice to defendant Olivier Amar and Patrick Vovor. Defendant Javice has no objection to its admission. *See* Tr. 2994-95. Only defendant Amar objects. The Court should adhere to the reasoning that the Court already articulated during the most recent trial day. *See* Tr. 3027-28, 3063-64. Indeed, the Court already held that “the document will be admitted” to be “fair[er] for all sides,” but agreed to defer ruling formally until the next trial day. Tr. 3063-64. The Court should adhere to its ruling and admit Government Exhibit 1762.

In Amar’s lengthy opposition, Amar fails to identify any actual prejudice from this calendar invitation, about which all parties can make their arguments to the jury, who will then decide what, if anything, to make of it.¹ The reality is that there is simply nothing prejudicial about the August 1 calendar invitation, which shows merely that Amar was invited to a 12:30 meeting with Javice and Vovor, even though Mr. Vovor did not recall that Amar was invited on August 1. In that respect, it is no different than the metadata that *Amar* introduced into evidence during the last trial day, which shows Mr. Vovor viewed a certain spreadsheet on August 1, even though Mr. Vovor did not recall viewing that spreadsheet on August 1. While there is no prejudice from the August 1 calendar invitation, precluding it would be unfair to the Government because it would hamstring the Government’s ability to argue that Javice was not cutting out Amar; rather, she included him on the August 1 invitation.

In short, the Court should adhere to its ruling on Thursday. Government Exhibit 1762 should be admitted because it is relevant and not prejudicial, and because preventing its admission would be unfair to the Government.

¹ Needless to say, the concepts of being invited to meetings and attending meetings are not beyond the ken of a New York jury.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

By: /s/
Rushmi Bhaskaran
Nicholas W. Chiuchiolo
Micah F. Fergenson
Georgia V. Kostopoulos
Assistant United States Attorneys
212-637-2439 / -1247 / -2190 / -2212